Exhibit D

Exhibit D

'000 Patent, claim 1

Claim Element	Allegations in the First Amended Complaint	Alleged Actors in the First Amended Complaint
1. An apparatus, comprising:	Paragraphs 103-107 of the First Amended Complaint 103. As described above (*see* ¶ 51), the Accused Instrumentalities comprise an apparatus for providing recruitment information. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including riders, job seekers, contractors, and employers) in the United States. The apparatus comprises a memory device, a processing device, and a transmitter. On information and belief, the Accused Instrumentalities comprise an apparatus built on the Amazon Web Services Platform, which is itself comprised of a multitude of components including the Lyft Multimodal Platform, Backend Platform Systems, Financial Applications, and the Lyft Website. Further on information and belief, the Lyft Platform relies on the Amazon DynamoDB, which is a database for delivering high performance at scale. Still further, on information and belief, Lyft leverages the Amazon Elastic Container Service for Kubernetes, and Amazon Lambda. 104. As described above (*see* ¶ 52), and on information and belief, the infringing Lyft apparatus further comprises a data lake on the Amazon Simple Storage Service (Amazon S3), which leverages Amazon Redshift to analyze the vast amount of data Lyft stores on the Cloud. On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services data centers located across the United States.	Lyft

	105. As described above (*see* ¶ 53), and on information and belief, the infringing Lyft apparatus maintains and stores in memory realtime data with respect to the location of available (and soon-to-be available) Independent Contractors (*i.e.,* the drivers); the data includes at least information concerning the vehicle and present occupancy/capacity. On information and belief, the Lyft apparatus further maintains and stores in memory real-time data concerning the location and needs of the hiring entity or employer (*i.e.,* the rider). On information and belief, the infringing Lyft apparatus further filters all Independent Contractors by their respective GPS locations and capacities relative to the needs and location of the hiring entity (rider) in real-time; riders are then related to the most appropriate Independent Contractors. On information and belief, this "pairing" process is further informed by the estimated arrival time of the driver, as well as the mutual driver and rider preferences. 106. As described above (*see* ¶ 54), and on information end belief, the infringing Lyft apparatus processes the relevant information as noted above in order to approximate arrival times, and delivers job notifications out to the Independent Contractors in order of priority until the opportunity is accepted. Drivers are able to perform job search queries by going into "Driver Mode" to "Go Online" as an available contractor for hire. 107. As described above (*see* ¶ 55), and on information and belief, the infringing Lyft apparatus comprises a multitude of databases to store the pertinent data, all of which are based on the Amazon Web Services Platform. On information and belief, the Lyft Accused Instrumentalities comprise multiple data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are located Worldwide.	
a memory device, wherein the memory device stores work schedule information or scheduling information for an	Paragraphs 108 of the First Amended Complaint 108. As described above (*see* ¶ 56), the Lyft Accused Instrumentalities comprise a memory device, which stores information regarding individuals available for applying for a job opportunity or hiring need. More specifically, and on information and belief, the Lyft memory device stores information concerning	Lyft

employer or a hiring entity, or for an individual, an independent contractor, a temporary worker, or a freelancer;	drivers who are available and willing to accept assignments within the Lyft network. Such information comprises work schedule information and/or scheduling information for such drivers. The Lyft Accused Instrumentalities store work schedule information for each such driver (independent contractor) by virtue of the driver's "Online" availability, which is indicated via the Lyft Driver Mobile Application and stored in the Lyft memory devices. Each such driver, on information and belief, is employed by Lyft as an Independent Contractor and is retained by users of the Lyft apparatus to perform specific, defined tasks for the benefit of the user.	
a receiver, wherein the receiver receives a first request,	Paragraph 109 of the First Amended Complaint

109. As described above (*see* ¶ 55), and on information and belief, the Lyft Accused Instrumentalities comprise servers (receivers) for receiving a first request from a communication device associated with a hiring entity (e.g., the mobile device of a user of the Lyft Mobile App for Riders and/or the computing device of the user of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated and contains information regarding a request to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. As described above (*see* ¶ 54), such first request is processed and a first message containing Estimated Time and location information is transmitted by the Lyft transmitter to the first communication device (Lyft mobile application). If acceptable, the user has the option of placing the formal Request and completing the transaction (i.e., by making a second request to engage the services of the available driver). As described above (*see* ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., "processors"). On information and belief, such processors are associated with the public-facing elements of the infringing apparatus, including the website at www.uber.com and related mobile applications. On information and belief, such processors are specially programmed to processes and provide job search and recruitment information concerning drivers and riders. The processors are programmed to process the | Lyft; Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at Lyft.com) |

	information concerning the job search request in real-time (i.e., "upon a detection of an occurrence of a searching event"), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted over the Internet or World Wide Web to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
wherein the first request contains information regarding a request to obtain work schedule information or scheduling information for the employer, the hiring entity, the individual, the independent contractor, the temporary worker, or the freelancer,	Paragraph 109 of the First Amended Complaint 109. As described above (*see* ¶ 55), and on information and belief, the Lyft Accused Instrumentalities comprise servers (receivers) for receiving a first request from a communication device associated with a hiring entity (e.g., the mobile device of a user of the Lyft Mobile App for Riders and/or the computing device of the user of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated and contains information regarding a request to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. As described above (*see* ¶ 54), such first request is processed and a first message containing Estimated Time and location information is transmitted by the Lyft transmitter to the first communication device (Lyft mobile application). If acceptable, the user has the option of placing the formal Request and completing the transaction (i.e., by making a second request to engage the services of the available driver). As described above (*see* ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., "processors"). On information and belief, such processors are associated with the public-facing elements of the infringing apparatus, including the website at www.uber.com and related mobile applications. On information and belief, such processors are specially programmed to processes and provide job search and recruitment information	Lyft; Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at Lyft.com)

	concerning drivers and riders. The processors are programmed to process the information concerning the job search request in real-time (i.e., "upon a detection of an occurrence of a searching event"), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted over the Internet or World Wide Web to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
wherein the first request is transmitted from a first communication device associated with an employer or hiring entity or associated with an individual, an independent contractor, a temporary worker, or a freelancer	<u>Paragraph 109 of the First Amended Complaint</u> 109. As described above (*see* ¶ 55), and on information and belief, the Lyft Accused Instrumentalities comprise servers (receivers) for receiving a first request from a communication device associated with a hiring entity (e.g., the mobile device of a user of the Lyft Mobile App for Riders and/or the computing device of the user of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated and contains information regarding a request to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. As described above (*see* ¶ 54), such first request is processed and a first message containing Estimated Time and location information is transmitted by the Lyft transmitter to the first communication device (Lyft mobile application). If acceptable, the user has the option of placing the formal Request and completing the transaction (i.e., by making a second request to engage the services of the available driver). As described above (*see* ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., "processors"). On information and belief, such processors are associated with the public-facing elements of the infringing apparatus, including the website at www.uber.com and related mobile applications. On information and belief, such processors are specially	Lyft

	programmed to processes and provide job search and recruitment information concerning drivers and riders. The processors are programmed to process the information concerning the job search request in real-time (i.e., "upon a detection of an occurrence of a searching event"), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted over the Internet or World Wide Web to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
a processing device,	<u>Paragraph 109 of the First Amended Complaint</u> 109. As described above (*see* ¶ 55), and on information and belief, the Lyft Accused Instrumentalities comprise servers (receivers) for receiving a first request from a communication device associated with a hiring entity (e.g., the mobile device of a user of the Lyft Mobile App for Riders and/or the computing device of the user of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated and contains information regarding a request to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. As described above (*see* ¶ 54), such first request is processed and a first message containing Estimated Time and location information is transmitted by the Lyft transmitter to the first communication device (Lyft mobile application). If acceptable, the user has the option of placing the formal Request and completing the transaction (i.e., by making a second request to engage the services of the available driver). As described above (*see* ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., "processors"). On information and belief, such processors are associated with the public-facing elements of the infringing apparatus, including the website at www.uber.com and related mobile	Lyft

	applications. On information and belief, such processors are specially programmed to processes and provide job search and recruitment information concerning drivers and riders. The processors are programmed to process the information concerning the job search request in real-time (i.e., "upon a detection of an occurrence of a searching event"), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted over the Internet or World Wide Web to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
wherein the processing device is specially programmed for processing information contained in the first request,	Paragraph 109 of the First Amended Complaint 109. As described above (*see* ¶ 55), and on information and belief, the Lyft Accused Instrumentalities comprise servers (receivers) for receiving a first request from a communication device associated with a hiring entity (e.g., the mobile device of a user of the Lyft Mobile App for Riders and/or the computing device of the user of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated and contains information regarding a request to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. As described above (*see* ¶ 54), such first request is processed and a first message containing Estimated Time and location information is transmitted by the Lyft transmitter to the first communication device (Lyft mobile application). If acceptable, the user has the option of placing the formal Request and completing the transaction (i.e., by making a second request to engage the services of the available driver). As described above (*see* ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., "processors"). On information and belief, such processors are associated with the public-facing elements of the infringing	Lyft

	apparatus, including the website at www.uber.com and related mobile applications. On information and belief, such processors are specially programmed to processes and provide job search and recruitment information concerning drivers and riders. The processors are programmed to process the information concerning the job search request in real-time (i.e., "upon a detection of an occurrence of a searching event"), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted over the Internet or World Wide Web to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
wherein the processing device generates a first message containing the work schedule information or the scheduling information for the employer, the hiring entity, the individual, the independent contractor, the temporary worker, or the freelancer; and	Paragraph 109 of the First Amended Complaint 109. As described above (*see* ¶ 55), and on information and belief, the Lyft Accused Instrumentalities comprise servers (receivers) for receiving a first request from a communication device associated with a hiring entity (e.g., the mobile device of a user of the Lyft Mobile App for Riders and/or the computing device of the user of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated and contains information regarding a request to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. As described above (*see* ¶ 54), such first request is processed and a first message containing Estimated Time and location information is transmitted by the Lyft transmitter to the first communication device (Lyft mobile application). If acceptable, the user has the option of placing the formal Request and completing the transaction (i.e., by making a second request to engage the services of the available driver). As described above (*see* ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., "processors"). On information and belief, such	Lyft

	processors are associated with the public-facing elements of the infringing apparatus, including the website at www.uber.com and related mobile applications. On information and belief, such processors are specially programmed to processes and provide job search and recruitment information concerning drivers and riders. The processors are programmed to process the information concerning the job search request in real-time (i.e., "upon a detection of an occurrence of a searching event"), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted over the Internet or World Wide Web to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
a transmitter,	Paragraph 109 of the First Amended Complaint 109. As described above (*see* ¶ 55), and on information and belief, the Lyft Accused Instrumentalities comprise servers (receivers) for receiving a first request from a communication device associated with a hiring entity (e.g., the mobile device of a user of the Lyft Mobile App for Riders and/or the computing device of the user of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated and contains information regarding a request to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. As described above (*see* ¶ 54), such first request is processed and a first message containing Estimated Time and location information is transmitted by the Lyft transmitter to the first communication device (Lyft mobile application). If acceptable, the user has the option of placing the formal Request and completing the transaction (i.e., by making a second request to engage the services of the available driver). As described above (*see* ¶¶ 51-55), the Lyft Accused Instrumentalities comprise servers located at data centers across the United States	Lyft

	which include processors (i.e., "processors"). On information and belief, such processors are associated with the public-facing elements of the infringing apparatus, including the website at www.uber.com and related mobile applications. On information and belief, such processors are specially programmed to processes and provide job search and recruitment information concerning drivers and riders. The processors are programmed to process the information concerning the job search request in real-time (i.e., "upon a detection of an occurrence of a searching event"), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted over the Internet or World Wide Web to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
wherein the transmitter transmits the first message to the first communication device or to a second communication device,	Paragraph 109 of the First Amended Complaint 109. As described above (*see* ¶ 55), and on information and belief, the Lyft Accused Instrumentalities comprise servers (receivers) for receiving a first request from a communication device associated with a hiring entity (e.g., the mobile device of a user of the Lyft Mobile App for Riders and/or the computing device of the user of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated and contains information regarding a request to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. As described above (*see* ¶ 54), such first request is processed and a first message containing Estimated Time and location information is transmitted by the Lyft transmitter to the first communication device (Lyft mobile application). If acceptable, the user has the option of placing the formal Request and completing the transaction (i.e., by making a second request to engage the services of the available driver). As described above (*see* ¶¶ 51-55), the Lyft Accused	Lyft

	Instrumentalities comprise servers located at data centers across the United States which include processors (i.e., "processors"). On information and belief, such processors are associated with the public-facing elements of the infringing apparatus, including the website at www.uber.com and related mobile applications. On information and belief, such processors are specially programmed to processes and provide job search and recruitment information concerning drivers and riders. The processors are programmed to process the information concerning the job search request in real-time (i.e., "upon a detection of an occurrence of a searching event"), using the ride request information as provided by the employer or hiring entity (i.e., the ride requestor). Each such request is an advertised job opening, position, assignment, contract, and/or project, which the individual Independent Contractor drivers can accept or decline, following receipt of a message (which is generated by the processing device and electronically transmitted over the Internet or World Wide Web to the mobile application of the Independent Contractor from the Lyft transmitter) in real-time concerning the available assignment via the Lyft Mobile Application for Drivers.	
wherein the apparatus processes information contained in a second request,	Paragraph 110 of the First Amended Complaint 110. On information and belief, when a user completes a formal Ride Request using the Lyft Accused Instrumentalities, the Request comprises a Second Request to engage and obtain the Lyft Independent Contractor in the vicinity, and to thereafter complete the ride transaction. On information and belief, the Independent Contractor Drivers are notified via "push notification" (i.e., via a "second message") when a new ride opportunity is available, based on their proximity and capacity. The "second message" contains information regarding the second request, and is transmitted to a second communication device (i.e., the Lyft mobile application for drivers) associated with the Independent Contractor. If the initial driver does not timely respond by accepting the position, it is passed to the next available driver for consideration. Ultimately, the Second Request is confirmed, and the user is then provided with arrival information, including driver and vehicle data in real-time.	Lyft; Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at Lyft.com)

| wherein the second request contains information for offering services of the individual, the independent contractor, the temporary worker, or the freelancer, to the employer or hiring entity, or contains information for the employer or hiring entity reserving or requesting the services of the individual, the independent contractor, the temporary worker, or the freelancer, | <u>Paragraph 110 of the First Amended Complaint</u>

110. On information and belief, when a user completes a formal Ride Request using the Lyft Accused Instrumentalities, the Request comprises a Second Request to engage and obtain the Lyft Independent Contractor in the vicinity, and to thereafter complete the ride transaction. On information and belief, the Independent Contractor Drivers are notified via "push notification" (i.e., via a "second message") when a new ride opportunity is available, based on their proximity and capacity. The "second message" contains information regarding the second request, and is transmitted to a second communication device (i.e., the Lyft mobile application for drivers) associated with the Independent Contractor. If the initial driver does not timely respond by accepting the position, it is passed to the next available driver for consideration. Ultimately, the Second Request is confirmed, and the user is then provided with arrival information, including driver and vehicle data in real-time. | Lyft; Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at Lyft.com) |
| wherein the information contained in the second request is based on the work schedule information or the scheduling information for the employer, the hiring entity, the individual, the independent | <u>Paragraph 110 of the First Amended Complaint</u>

110. On information and belief, when a user completes a formal Ride Request using the Lyft Accused Instrumentalities, the Request comprises a Second Request to engage and obtain the Lyft Independent Contractor in the vicinity, and to thereafter complete the ride transaction. On information and belief, the Independent Contractor Drivers are notified via "push notification" (i.e., via a "second message") when a new ride opportunity is available, based on their proximity and capacity. The "second message" contains information regarding the second request, and is transmitted to a second communication device (i.e., the Lyft mobile application for drivers) associated with the Independent Contractor. If the | Lyft; Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at Lyft.com) |

contractor, the temporary worker, or the freelancer, contained in the first message.	initial driver does not timely respond by accepting the position, it is passed to the next available driver for consideration. Ultimately, the Second Request is confirmed, and the user is then provided with arrival information, including driver and vehicle data in real-time.	